

November 25, 2005

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Compliance Letter; *IP-Enabled Services, WC Docket No. 04-36; E911 Requirements for IP-Enabled Service Providers, WC Docket No. 05-196*

Dear Ms. Dortch:

O1 Communications, Inc. ("O1"), in response to the Public Notices issued by the Enforcement Bureau, and in compliance with the FCC's VoIP 911 Order,¹ submits this report to advise the Commission of the status of O1's efforts to comply with Commission Rule 9.5.

Subscriber Notification, Acknowledgement, Labeling

Each of O1's VoIP subscribers has received, and has acknowledged reading and understanding, the E911 Dialing Notice attached. O1 has obtained, and is keeping, a record of affirmative acknowledgement of this notice by every subscriber, both old and new. In addition, O1 has distributed labels to its subscribers warning them that E911 service may be limited or unavailable from their VoIP telephones.

O1's 911 Solution

O1 has implemented a 911 solution that provides E911 service to 100% of its VoIP subscribers. This result is accomplished using a specialized analog telephone adapter ("ATA") in combination with a standard POTS line. In every location where O1 provides VoIP services, O1 has also arranged for a standard analog POTS line to be installed by the incumbent local exchange carrier ("ILEC"). O1 attaches to this POTS line a specialized ATA that is connected both to the public switched telephone network ("PSTN") (using the POTS line), and to O1's VoIP network. O1 has programmed its network with logic that ensures that when a VoIP subscriber dials 911, the call is routed through the ATA over the standard POTS line to the PSTN. O1 orders this POTS line using the subscriber's physical address, ensuring that when 911 calls are placed over this line that the 911 caller's ANI and Registered Location is transmitted to all answering points that are capable of receiving and processing this information with the appropriate Automatic Location Identification (ALI) database. The 911 caller's ANI and Registered Location is provided by ILEC that provides the POTS line for this service.

¹ *IP-Enabled Services and 911 Requirements for IP-Enabled Service Providers*, First Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 10245, 10273, ¶ 50 (2005); 47 C.F.R. § 9.5(f).

Using this POTS line in combination with the ATA, all 911 calls are routed to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority utilizing the Selective Router, the trunk line(s) between the Selective Router and the PSAP, and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized.

O1 has also deployed an emergency phone at each VoIP subscriber's location that allows them to dial 911 even if building power or IP network services are unavailable. As long as the POTS line operates, O1's VoIP subscribers can dial 911. Thus, O1 VoIP subscribers that dial 911 receive the same quality of 911 service as the ILEC provides for subscribers of non-IP enabled services.

O1's network is physically connected to four selective routers in the Sacramento LATA. However, due to the nature of O1's VoIP 911 solution, O1's VoIP subscribers have full access to the ILEC's 911 network.

Registered Location Information

O1 obtains its VoIP subscribers' Registered Locations at the time those subscribers order VoIP service. O1's VoIP subscribers are not permitted to utilize VoIP service at any location other than their normal place of business, which is the same as the Registered Location. The Registered Location is associated with the POTS line that O1 orders to the VoIP subscribers' place of business. O1's VoIP subscribers are not permitted to use O1's VoIP services nomadically. O1 has obtained Registered Location information from 100% of its VoIP subscribers. In every case, ANI and Registered Location are being transmitted by the ILEC that supplies the POTS line to answering points that are capable of receiving and processing this information. O1's VoIP subscribers may update their Registered Location information whenever the physical address for their normal place of business changes, in which case O1 will order a new POTS line to the VoIP subscribers' new location.

Respectfully submitted,



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